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December 7, 2021

The Honorable Maryellen Noreika  
J. Caleb Boggs Federal Building  
844 North King Street  
Room 4324, Unit 19  
Wilmington, DE 19801-3555

VIA ELECTRONIC FILING

Re: *United States of America v. United States Sugar Corporation, et al.*  
C.A. No. 21-1644 (MN)

Dear Judge Noreika:

We write on behalf of Defendants in response to DOJ's letter of yesterday. Although we disagree with the recitation of events in DOJ's letter, most of the inaccuracies are immaterial to the issues currently before the Court. To the extent necessary, Defendants will address any relevant factual disputes in our December 17 reply brief. In the interim, we will continue to meet and confer with DOJ, as we did last Friday concerning the pending requests, to try to narrow any disputes regarding scheduling and discovery. In light of the Court's Order of yesterday, we are optimistic that the parties will be able to reach agreement on most, if not all, interim pre-trial dates and discovery issues.

Respectfully,

*/s/ Jack B. Blumenfeld*

Jack B. Blumenfeld (#1014)

JBB/bac

cc: All Counsel of Record (via electronic mail)